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March 30, 2020

Via ECF

Hon. Debra C. Freeman
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Manhattan Safety Maine, Inc. and Recovery Effort, Inc. v. Michael Bowen, et al.*,
Case No. 1:19-cv-5642 (MKV) (DCF)

Dear Judge Freeman:

On February 6, 2020, “[a]t the joint request of the parties and the new bankruptcy trustee,” the Court stayed the proceedings in the above-captioned action until March 30, 2020, “to facilitate the efforts of the bankruptcy trustee to engage all interested parties in discussions of a global settlement.” (Docket No. 60.) The Court further directed the parties to submit a joint status report on or before March 30, 2020. (*Id.*)

On behalf of all the parties, we respectfully report that, on March 4, 2020, the United States Bankruptcy Court for the Southern District of New York (No. 19-13895-JLG) held an initial status conference in the Orly Genger bankruptcy proceeding. At that conference, Judge James L. Garrity adjourned the status conference to allow the chapter 7 trustee to continue her investigation into the case. That investigation includes possible claims of the bankruptcy estate as well as the various Genger-related litigation that is currently pending, including this case.

With respect to the above-referenced matter, Judge Garrity asked counsel for plaintiffs in this matter to agree to continue the standstill until April 7 and counsel agreed to that date. *See* Exhibit A at 56:1-9 (agreement by plaintiffs’ counsel, Adam Pollock). At that time, April 7 was the date originally contemplated for the adjourned status conference, but the adjourned status conference was ultimately scheduled for May 5, 2020. In light of the current environment, plaintiffs have no objection to continuing this pause till the May 5, 2020 date of the bankruptcy court status conference.

We will advise the Court as soon as there is a change in the status of the bankruptcy case.

Hon. Debra C. Freeman

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Sincerely,

/s/ Natalia B. McGinn

Gerald E. Greenberg

Natalia B. McGinn

/s/ Christopher Gartman

William R. Maguire

Christopher Gartman

/s/ Adam L. Pollock

Adam L. Pollock

Christopher K. Leung

Counsel for Arie Genger

*Counsel for Arnold Broser,
David Broser, ADBG LLC and
Tedco, Inc.*

*Counsel for Manhattan
Safety Maine, Inc. and
Recovery Effort, Inc.*

Enclosure

cc (via email): Rocco Cavaliere, Esq.
(Counsel to the Bankruptcy Trustee)